

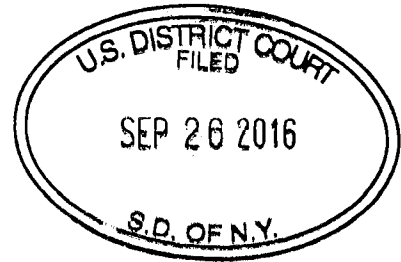
ORIGINAL

16 MAG 6128

Approved: _____

KARIN S. PORTLOCK

Assistant United States Attorney



Before: THE HONORABLE RONALD L. ELLIS
United States Magistrate Judge
Southern District of New York

DOC # _____

----- x
:
UNITED STATES OF AMERICA :
:
- v. - : 16 Mag.
:
ALEXIS CALO-VASQUEZ, : RULE 5(c)(3)
:
Defendant. : AFFIDAVIT
:
----- X

SOUTHERN DISTRICT OF NEW YORK, ss:

TIMOTHY VARIAN, being duly sworn, deposes and says that he is a Special Agent with Homeland Security Investigations ("HSI"), and charges as follows:

On or about September 23, 2016 the United States District Court for the District of Puerto Rico issued a warrant for the arrest of "Alexis Calo-Vazquez a/k/a 'Calo'," pursuant to an indictment under case number 16-Cr-591, charging him with, *inter alia*, narcotics offenses. Copies of the arrest warrant and indictment are attached hereto and incorporated by reference herein.

I believe that ALEXIS CALO-VASQUEZ, the defendant, who was arrested by HSI in the Southern District of New York, is the same individual as "Alexis Calo-Vazquez a/k/a 'Calo,'" who is wanted in the District of Puerto Rico.

The bases of my knowledge and for the foregoing charge are, in part, as follows:

1. I am a Special Agent with HSI. I have been directly involved in determining whether ALEXIS CALO-VAZQUEZ, the defendant, is the same individual as the "Alexis Calo-Vazquez a/k/a 'Calo,'" named in the September 23, 2016 arrest

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warrant from the United States District Court for the District of Puerto Rico. Because this Affidavit is submitted for the limited purpose of establishing the identity of the defendant, I have not included in this Affidavit each and every fact that I have learned. Where I report statements made by others, those statements are described in substance and in part, unless otherwise noted.

2. Based on my involvement in this investigation, I have learned that:

a. On or about September 23, 2016, the United States District Court for the District of Puerto Rico issued a warrant for the arrest of "Alexis Calo-Vazquez, a/k/a 'Calo.'"

b. The warrant was issued in connection with criminal case number 16-Cr-591. The basis for the warrant was an indictment returned by a grand jury sitting in the United States District Court for the District of Puerto Rico on September 23, 2016 charging "Alexis Calo-Vazquez, a/k/a 'Calo'" and seventy other defendants with, *inter alia*, narcotics offenses, including conspiracy to distribute 280 grams and more of crack cocaine, one kilogram and more of heroin, five kilograms and more of cocaine and other controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1), 846, and 860. See Ex. A.

3. Based on my personal involvement in this investigation, I am aware that at approximately 7:20 a.m. on September 26, 2016, ALEXIS CALO-VAZQUEZ, the defendant, was arrested at 1058 Southern Boulevard, Apartment #205 in the Bronx, New York, by HSI pursuant to the warrant issued by the United States District Court for the District of Puerto Rico.

4. Upon his arrest on September 26, 2016, ALEXIS CALO-VAZQUEZ, the defendant, told me that his name was "Alexis Calo-Vasquez." I further recognized CALO-VAZQUEZ as the individual sought in connection with the above-referenced charges, from a photograph taken in connection with the issuance of a Puerto Rican identification document of "Alexis Calo-Vazquez" that I had previously reviewed.

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WHEREFORE, deponent respectfully requests that ALEXIS CALO-VAZQUEZ, the defendant, be imprisoned or bailed as the case may be.



TIMOTHY VARIAN
Special Agent
Homeland Security Investigations

Sworn to before me this
26th day of September, 2016.



THE HONORABLE RONALD L. ELLIS
United States Magistrate Judge
Southern District of New York

Exhibit A

RECEIVED AMERICAN
CLERK'S
U.S. DISTRICT COURT
SAN JUAN, PR

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

2016 SEP 23 PM 4:43

UNITED STATES OF AMERICA,

Plaintiff,

v.

[1] JARET NAVEDO-MELÉNDEZ,
a/k/a "Fifty", "El Negro", "El Feo", "La Negra",
"Yaret Navedo-Melendez"

(Counts ONE through SIX)

[2] JULIO GONZÁLEZ-BURGOS,
a/k/a "Piti", "Pitipua", "Tito",

(Counts ONE through SIX)

[3] JOSÉ DAVIER CARVENTE-GUZMÁN,
a/k/a "Davo",

(Counts ONE through SIX)

[4] KILPATRICK ACOSTA-CRUZ,
a/k/a "Kilpa",

(Counts ONE through SIX)

[5] SERGIO E. SANTA-OTERO,
a/k/a "Bebo Sergio",

(Counts ONE through SIX)

[6] JEANCRISTH N. REYES-MASSO,
(Counts ONE through FIVE)

[7] CARLOS R. HERNÁNDEZ-RODRÍGUEZ,
a/k/a "Vitolo",

(Counts ONE through FIVE)

[8] ÁNGEL ROMÁN-AYALA,
a/k/a "Botija",

(Counts ONE through FIVE)

[9] JESSENIA DÍAZ-COLÓN,
a/k/a "Yeya",

(Counts ONE through FIVE)

[10] ELBA IRIS ESTRADA-NEGRÓN,
(Counts ONE through FIVE)

[11] RAFAEL O. ÁLVAREZ-CRUZ,
a/k/a "Rafa",

(Counts ONE through FIVE)

[12] NOEL MANZANO-CINTRÓN,
a/k/a "Gordo Sacha",

(Counts ONE through FIVE)

INDICTMENT

FILED UNDER SEAL

CRIMINAL NO. 16- 591 (GAG)

Violations:

(COUNT ONE)

Title 21, *United States Code*, §§ 841(a)(1),
846, and 860

(COUNT TWO)

Title 21, *United States Code*, §§ 841(a)(1)
and 860 and Title 18, *United States Code* §
2

(COUNT THREE)

Title 21, *United States Code*, §§ 841(a)(1)
and 860 and Title 18, *United States Code*, §
2

(COUNT FOUR)

Title 21, *United States Code*, §§ 841(a)(1)
and 860 and Title 18, *United States Code*, §
2

(COUNT FIVE)

Title 21, *United States Code*, §§ 841(a)(1)
& (b)(1)(D) and 860 and Title 18, *United
States Code*, § 2

(COUNT SIX)

Title 18, *United States Code*, §
924(c)(1)(A)

Narcotics Forfeiture Allegation

Title 21, *United States Code*, § 853 and
Rule 32.2(a) F.R.C.P.

(SIX COUNTS)

United States of America vs.

Jaret Navedo-Melendez, a/k/a "Fifty", "El Negro", "El Feo", "La Negra", "Yaret Navedo-Melendez" et al.

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[13] CARLOS LUIS HERNÁNDEZ-RODRÍGUEZ,

a/k/a "Bebo Cucaracha",

(Counts ONE through FIVE)

[14] FNU LNU,

a/k/a "Alex Tota",



(Counts ONE through FIVE)

[15] KENNY J. RODRÍGUEZ-RODRÍGUEZ,

a/k/a "Kenny Kencho",

(Counts ONE through SIX)

[16] LUIS A. RÍOS-PÉREZ,

a/k/a "Luis el Quemao",

(Counts ONE through SIX)

[17] ANÍBAL GONZÁLEZ-BURGOS,

a/k/a "Ñengo",

(Counts ONE through SIX)

[18] JOEL OZUNA-RIVERA,

(Counts ONE through SIX)

[19] ROBERTO ROMERO-RIVERA,

a/k/a "Wiñi",

(Counts ONE through SIX)

[20] ABRAHAM MARCANO-MELÉNDEZ,

(Counts ONE through SIX)

[21] BENJAMIN SANTANA-GARCÍA,

a/k/a "Benji Raton",

(Counts ONE through FIVE)

[22] FREDDY LÓPEZ-PÉREZ,

(Counts ONE through FIVE)

[23] ALEXANDER PALOMARES-ORTÍZ,

a/k/a "Palomares", "Palo",

(Counts ONE through FIVE)

[24] ÁNGEL REYES-COLÓN,

(Counts ONE through FIVE)

[25] JOSHUA CAMPOS,

(Counts ONE through FIVE)

[26] BRENDA IVELISSE RÍOS-PÉREZ,

(Counts ONE through FIVE)

[27] EDWIN AMILL ROJAS,

a/k/a "Wiwi",

United States of America vs.

Jaret Navedo-Melendez, a/k/a "Fifty", "El Negro", "El Feo", "La Negra", "Yaret Navedo-Melendez" et al.

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(Counts ONE through FIVE)

[28] JOSEPH MARTÍNEZ-ÁVILA,
a/k/a "Gordo",

(Counts ONE through FIVE)

[29] VICTOR A. FÉLIX-MORALES,
a/k/a "Victor Maribella",

(Counts ONE through FIVE)

[30] MARK ANTHONY MONTANER-
MELÉNDEZ,

a/k/a "Mikey",

(Counts ONE through FIVE)

[31] KIDANY GUERRA-VIZCARRONDO,

(Counts ONE through FIVE)

[32] SAMUEL URBINA-ORTÍZ,

a/k/a "Tweety",

(Counts ONE through FIVE)

[33] FELICIA EDWARDS,

a/k/a "La Negra",

(Counts ONE through FIVE)

[34] WILLIAM HOMMY BACHIER-FEBRES,

a/k/a "Mono",

(Counts ONE through FIVE)

[35] PEDRO LUIS HERNÁNDEZ-
RODRÍGUEZ,

a/k/a "Rasta",

(Counts ONE through FIVE)

[36] BLANCA AURORA CALO-VÁZQUEZ,

a/k/a "Blanquita",

(Counts ONE through FIVE)

[37] MIGUEL DEL VALLE-LÓPEZ,

a/k/a "Maiky",

(Counts ONE through FIVE)

[38] FNU LNU,

a/k/a "La Perri",



(Counts ONE through FIVE)

[39] IVÁN J. MATOS-MORALES,
a/k/a "Ojos Bellos",

(Counts ONE through FIVE)

[40] ZULMA RIVERA-BENÍTES,

(Counts ONE through FIVE)

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Yaret Navedo-Melendez, a/k/a "Fifty", "El Negro", "El Feo", "La Negra", "Yaret Navedo-Melendez" et al.

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[41] GISARO JAVIER PÉREZ-CASTRO,
a/k/a "Bebo Monacillo", "Indio", "Mejicano",
(Counts ONE through FIVE)

[42] CHRISTOPHER ANDINO-ARROYO,
a/k/a "Bemba",
(Counts ONE through FIVE)

[43] JOSÉ A. VÁZQUEZ-ROSARIO,
a/k/a "Mazuso",
(Counts ONE through FIVE)

[44] EZEQUIEL CORTÉZ-RODRÍGUEZ,
(Counts ONE through FIVE)

[45] ERICK MANUEL ANDRADES-TORRES,
a/k/a "Coquito",
(Counts ONE through FIVE)

[46] ÁNGEL L. QUINTANA-MORENO,
a/k/a "Quintana",
(Counts ONE through FIVE)

[47] MOISES GONZÁLEZ-PADILLA,
(Counts ONE through FIVE)

[48] JOEL PERILLO-BORRERO,
a/k/a "Clifford",
(Counts ONE through FIVE)

[49] JUAN MANUEL SANTIAGO,
a/k/a "Juanma", "Chucky",
(Counts ONE through FIVE)

[50] KAREN RIVERA-FIGUEROA,
a/k/a "Aloha",
(Counts ONE through FIVE)

[51] JOSÉ A. LÓPEZ-MAGRIS,
a/k/a "Cirilo",
(Counts ONE through FIVE)

[52] WILLIAM RÍOS-RIVERA,
a/k/a "Jordan",
(Counts ONE through FIVE)

[53] JOSÉ ABRAHAM MARTÍNEZ-CASTRO,
a/k/a "Abran", "Negro",
(Counts ONE through FIVE)

[54] CARLOS GÓMEZ,
a/k/a "Anyu",
(Counts ONE through FIVE)

[55] JUAN M. QUIROZ-GUTIÉRREZ,
(Counts ONE through FIVE)

[56] FRANCHELY MARTÍNEZ-CASTRO,
(Counts ONE through FIVE)

United States of America vs.

Jaret Navedo-Melendez, a/k/a "Fifty", "El Negro", "El Feo", "La Negra", "Yaret Navedo-Melendez" et al.

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[57] ALEXIS CALO-VÁZQUEZ,
a/k/a "Calo",
(Counts ONE through FIVE)
[58] LUZ MARÍA COLÓN-MARTÍNEZ,
(Counts ONE through FIVE)
[59] JOSÉ ENRIQUE BATISTA,
a/k/a "Pitillo",
(Counts ONE through FIVE)
[60] RAMÓN ESTEBAN SOBERAL-PÉREZ,
a/k/a "Jordan",
(Counts ONE through FIVE)
[61] BABE RÍOS-FUENTES,
(Counts ONE through FIVE)
[62] CHRISTOPHER MAYSONET-GARCÍA,
(Counts ONE through FIVE)
[63] ROSEMARY RODRÍGUEZ-CABRERA,
(Counts ONE through FIVE)
[64] JOHN FONTÁNEZ-GONZÁLEZ,
a/k/a "Johnny Fontáñez-Gonzalez", "Chopa",
(Counts ONE through FIVE)
[65] MELVIN DÍAZ-ALLENDE,
a/k/a "Barba",
(Counts ONE through FIVE)
[66] JOHN ANTHONY ROLDÁN-COLÓN,
(Counts ONE through FIVE)
[67] MARÍA IVELISSE VALCARCEL,
a/k/a "Chory", "Shorty",
(Counts ONE through FIVE)
[68] GÉNESIS LIZETTE RUÍZ-LUGO,
a/k/a "La China",
(Counts ONE through FIVE)
[69] KEVIN WILLIAM PEÑA,
a/k/a "Gringo",
(Counts ONE through FIVE)
[70] RAÚL JULIÁN GALARZA-ROSADO,
a/k/a "Lilo",
(Counts ONE through FIVE)
[71] JONATHAN ALBÍZU-SANTIAGO,
(Counts ONE through FIVE)
[72] RAFAEL TORRES-VÁZQUEZ,
a/k/a "Swepchup",
(Counts ONE through FIVE)
Defendants.

THE GRAND JURY CHARGES:

COUNT ONE

(Conspiracy to Possess with Intent to Distribute Controlled Substances)

Beginning on a date unknown, but no later than in or about the year 2012, and continuing up to and until the return of the instant Indictment, in the Municipality of San Juan, District of Puerto Rico and within the jurisdiction of this Court,

- [1] JARET NAVEDO-MELÉNDEZ, a/k/a “Fifty”, “El Negro”, “El Feo”, “La Negra”, “Yaret Navedo-Melendez”
- [2] JULIO GONZÁLEZ-BURGOS, a/k/a “Piti”, “Pitipua”, “Tito”,
- [3] JOSÉ DAVIER CARVENTE-GUZMÁN, a/k/a “Davo”,
- [4] KILPATRICK ACOSTA-CRUZ, a/k/a “Kilpa”,
- [5] SERGIO E. SANTA-OTERO, a/k/a “Bebo Sergio”,
- [6] JEANCRISTH N. REYES-MASSO,
- [7] CARLOS R. HERNÁNDEZ-RODRÍGUEZ, a/k/a “Vitolo”,
- [8] ÁNGEL ROMAN-AYALA, a/k/a “Botija”,
- [9] JESSENIA DÍAZ-COLÓN, a/k/a “Yeya”,
- [10] ELBA IRIS ESTRADA-NEGRÓN,
- [11] RAFAEL O. ÁLVAREZ-CRUZ, a/k/a “Rafa”,
- [12] NOEL MANZANO-CINTRÓN, a/k/a “Gordo Sacha”,
- [13] CARLOS LUIS HERNÁNDEZ-RODRÍGUEZ, a/k/a “Bebo Cucaracha”,
- [14] FNU LNU, a/k/a “Alex Tota”,
- [15] KENNY J. RODRÍGUEZ-RODRÍGUEZ, a/k/a “Kenny Kencho”,
- [16] LUIS A. RÍOS-PÉREZ, a/k/a “Luis el Quemao”,
- [17] ANÍBAL GONZÁLEZ-BURGOS, a/k/a “Ñengo”,
- [18] JOEL OZUNA-RIVERA,
- [19] ROBERTO ROMERO-RIVERA, a/k/a “Wiñi”,
- [20] ABRAHAM MARCANO-MELÉNDEZ,
- [21] BENJAMIN SANTANA-GARCÍA, a/k/a “Benji Raton”,
- [22] FREDDY LÓPEZ-PÉREZ,
- [23] ALEXANDER PALOMARES-ORTÍZ, a/k/a “Palomares”, “Palo”,
- [24] ÁNGEL REYES-COLÓN,
- [25] JOSHUA CAMPOS,
- [26] BRENDA IVELISSE RÍOS-PÉREZ,
- [27] EDWIN AMILL ROJAS, a/k/a “Wiwi”,
- [28] JOSEPH MARTÍNEZ-ÁVILA, a/k/a “Gordo”,
- [29] VICTOR A. FÉLIX-MORALES, a/k/a “Victor Maribella”,
- [30] MARK ANTHONY MONTANER-MELÉNDEZ, a/k/a “Mikey”,
- [31] KIDANY GUERRA-VIZCARRONDO,
- [32] SAMUEL URBINA-ORTÍZ, a/k/a “Tweety”,
- [33] FELICIA EDWARDS, a/k/a “La Negra”,

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- [34] WILLIAM HOMMY BACHIER-FEBRES, a/k/a "Mono",
- [35] PEDRO LUIS HERNÁNDEZ-RODRÍGUEZ, a/k/a "Rasta",
- [36] BLANCA AURORA CALO-VÁZQUEZ, a/k/a "Blanquita",
- [37] MIGUEL DEL VALLE-LÓPEZ, a/k/a "Mailky",
- [38] FNU LNU, a/k/a "La Perri",
- [39] IVÁN J. MATOS-MORALES, a/k/a "Ojos Bellos",
- [40] ZULMA RIVERA-BENÍTES,
- [41] GISARO JAVIER PÉREZ-CASTRO, a/k/a "Bebo Monacillo", "Indio", "Mejicano",
- [42] CHRISTOPHER ANDINO-ARROYO, a/k/a "Bemba",
- [43] JOSÉ A. VÁZQUEZ-ROSARIO, a/k/a "Mazuso",
- [44] EZEQUIEL CORTÉZ-RODRÍGUEZ,
- [45] ERICK MANUEL ANDRADES-TORRES, a/k/a "Coquito",
- [46] ÁNGEL L. QUINTANA-MORENO, a/k/a "Quintana",
- [47] MOISES GONZÁLEZ-PADILLA,
- [48] JOEL PERILLO-BORRERO, a/k/a "Clifford",
- [49] JUAN MANUEL SANTIAGO, a/k/a "Juanma", "Chucky",
- [50] KAREN RIVERA-FIGUEROA, a/k/a "Aloha",
- [51] JOSÉ A. LÓPEZ-MAGRIS, a/k/a "Cirilo",
- [52] WILLIAM RÍOS-RIVERA, a/k/a "Jordan",
- [53] JOSÉ ABRAHAM MARTÍNEZ-CASTRO, a/k/a "Abran", "Negro",
- [54] CARLOS GÓMEZ, a/k/a "Anyu",
- [55] JUAN M. QUIROZ-GUTIÉRREZ,
- [56] FRANCHELY MARTÍNEZ-CASTRO,
- [57] ALEXIS CALO-VÁZQUEZ, a/k/a "Calo",
- [58] LUZ MARÍA COLÓN-MARTÍNEZ,
- [59] JOSÉ ENRIQUE BATISTA, a/k/a "Pitillo",
- [60] RAMÓN ESTEBAN SOBERAL-PÉREZ, a/k/a "Jordan",
- [61] BABE RÍOS-FUENTES,
- [62] CHRISTOPHER MAYSONET-GARCÍA,
- [63] ROSEMARY RODRÍGUEZ-CABRERA,
- [64] JOHN FONTÁNEZ-GONZÁLEZ, a/k/a "Johnny Fontáñez-Gonzalez", "Chopa",
- [65] MELVIN DÍAZ-ALLENDE, a/k/a "Barba",
- [66] JOHN ANTHONY ROLDAN-COLÓN,
- [67] MARÍA IVELISSE VALCARCEL, a/k/a "Chory", "Shorty",
- [68] GÉNESIS LIZETTE RUÍZ-LUGO, a/k/a "La China",
- [69] KEVIN WILLIAM PEÑA, a/k/a "Gringo",
- [70] RAÚL JULIÁN GALARZA-ROSADO, a/k/a "Lilo",
- [71] JONATHAN ALBÍZU-SANTIAGO,
- [72] RAFAEL TORRES-VÁZQUEZ, a/k/a "Swepchup",

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the defendants herein, did knowingly and intentionally, combine, conspire, and agree with each other and with diverse other persons known and unknown to the Grand Jury, to commit an offense against the United States, that is, to knowingly and intentionally possess with intent to distribute controlled substances, to wit: in excess of two hundred and eighty (280) grams of a mixture or substance containing a detectable amount of cocaine base (crack), a Schedule II Narcotic Drug Controlled Substance; in excess of one (1) kilogram of a mixture or substance containing a detectable amount of heroin, a Schedule I, Narcotic Drug Controlled Substance; in excess of five (5) kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II, Narcotic Drug Controlled Substance; a mixture or substance containing a detectable amount of marijuana, a Schedule I, Controlled Substance; a mixture or substance containing a detectable amount of Oxycodone (commonly known as Percocet), a Schedule II Controlled Substance; and a mixture or substance containing a detectable amount of Alprazolam (commonly known as Xanax), a Schedule IV Controlled Substance; within one thousand (1,000) feet of a real property comprising the Vista Hermosa Public Housing Project (hereinafter "Vista Hermosa"), a housing facility owned by a public housing authority, within one thousand (1,000) feet of a real property comprising a public or private elementary, vocational, or secondary school, and within one thousand (1,000) feet of a playground, all within the Municipality of San Juan, Puerto Rico. All in violation of Title 21, *United States Code*, Sections 841(a)(1), 846 and 860.

I. OBJECT OF THE CONSPIRACY

The object of the conspiracy was the large scale distribution of controlled substances at the Vista Hermosa Public Housing Project (hereinafter "Vista Hermosa"), located within the Municipality of San Juan, Puerto Rico, all for significant financial gain and profit.

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II. MANNER AND MEANS OF THE CONSPIRACY

The manner and means by which the defendants and co-conspirators would accomplish and further the object of the conspiracy, among others, included the following:

1. It was part of the manner and means of the conspiracy that the defendants and their co-conspirators would purchase wholesale quantities of heroin, cocaine and marijuana in order to distribute the same in street quantity amounts at their drug distribution points located in the Vista Hermosa Public Housing Project (hereinafter "Vista Hermosa"), within the Municipality of San Juan, Puerto Rico.

2. It was further part of the manner and means of the conspiracy that the defendants and their co-conspirators had significant ties to the drug trafficking organization and would act in different roles in order to further the goals of the conspiracy, to wit: leaders, drug point owners, runners, suppliers, enforcers, drug processors, sellers, and facilitators. It was further part of the manner and means of the conspiracy that the leader(s) would maintain a group of co-defendants who were responsible for administering the daily activities of the drug distribution points.

3. It was further part of the manner and means of the conspiracy that some of the defendants and their co-conspirators would weigh, "cut", divide, and package the heroin, cocaine, crack and marijuana in distinctive "baggies" and/or "vials" in order to keep track of their narcotics. The Alprazolam (commonly known as Xanax) and Oxycodone (commonly known as Percocet) pills were divided by narcotic drug, as well as by the markings on each individual pill.

4. It was further part of the manner and means of the conspiracy that some of the cocaine purchased at wholesale quantities would be converted into crack cocaine, "cooked", for subsequent sale and distribution at their drug distribution points.

5. It was further part of the manner and means of the conspiracy that there were numerous

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drug points, or locations from where controlled substances were sold, located within Vista Hermosa.

6. It was further a part of the manner and means of the conspiracy that the leader(s) of the drug trafficking organization gave numerous drug point owners, identified by seal/logo/sticker, permission to have their controlled substances sold alongside each other at particular locations.

7. It was further part of the manner and means of the conspiracy that some of the defendants and their co-conspirators would use residences located within Vista Hermosa and other locations outside the housing project in order to store and conceal heroin, cocaine base ("crack"), cocaine, marijuana, Alprazolam (commonly known as Xanax) and Oxycodone (commonly known as Percocet) drug paraphernalia, firearms, ammunition, drug ledgers, drug trafficking proceeds, and other records and equipment of the drug trafficking organization.

8. It was further part of the manner and means of the conspiracy that some of the defendants and their co-conspirators would often package and prepare the narcotics in various apartments located within Vista Hermosa, using those apartments as "drug laboratories".

9. It was further part of the manner and means of the conspiracy that some of the defendants and their co-conspirators would have access to different type of vehicles, including but not limited to cars, motorcycles and scooters, in order to transport and/or store money, narcotics and firearms.

10. It was further part of the manner and means of the conspiracy that the drug point owners regularly paid "rent" to the leader(s) of the drug trafficking organization in order to be able to sell controlled substances within Vista Hermosa.

11. It was further part of the manner and means of the conspiracy that high level members of the drug trafficking organization or leaders would regularly collect dues from the sales of the drug point shifts to create a money depository (known as "*la prote*," in Spanish) in order to pay for the

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protection offered by the "lookouts".

12. It was further part of the manner and means of the conspiracy that the defendants and their co-conspirators would use two-way radios ("walkie-talkies" referred to as scanners) in order to communicate and notify the presence of law enforcement agents or members of rival gangs.

13. It was further part of the manner and means of the conspiracy that the defendants and their co-conspirators would also use cellular phones in order to communicate and alert the runner(s) that additional controlled substances were needed at the drug point(s).

14. It was further part of the manner and means of the conspiracy that some of the defendants and their co-conspirators would routinely possess, carry, brandish, and use firearms to protect themselves and their drug trafficking organization. At different points during the conspiracy, some defendants and their co-conspirators used different types of firearms in order to protect themselves, the narcotics, and their profits from rival drug trafficking gangs.

15. It was further part of the manner and means of the conspiracy that some of the defendants and their co-conspirators would often act as "lookouts" at several strategically located "observation points", all located within the Vista Hermosa, and would alert other co-conspirators of the presence of law enforcement agents and/or rival drug traffickers.

16. It was further part of the manner and means of the conspiracy that members of the drug trafficking organization would use force, violence, and intimidation to intimidate rival drug trafficking organizations, and to discipline members of their own drug trafficking organization.

17. It was further part of the manner and means of the conspiracy that Vista Hermosa was under the rules dictated by the leader(s) regarding the location from where controlled substances could be sold, how conflict resolution between members of the drug trafficking organization was to be handled, how conflict resolution between Vista Hermosa residents not related to the drug trafficking

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organization was to be handled, etc. If said rules were violated, the leader(s) or high level members of the drug trafficking organization would use force, violence, and intimidation against the offenders (known as "*cobrar falla*" in Spanish) in an effort to maintain order within Vista Hermosa.

18. It was further part of the manner and means of the conspiracy that high level members of the drug trafficking organization or leaders would order and/or authorize, the use of force and violence against other individuals and/or against members of their own drug trafficking organization suspected of providing information to law enforcement.

19. It was further part of the manner and means of the conspiracy that the leaders of the drug trafficking organization had the final approval as to any disciplinary action to be imposed upon residents of Vista Hermosa and/or members of the conspiracy, as well as rival gang members.

III. ROLES OF THE MEMBERS OF THE CONSPIRACY

A. Leaders/Drug Point Owners:

Leaders directly controlled and supervised the drug trafficking activities at the drug points located within the Vista Hermosa Public Housing Project and other areas nearby in the Municipality of San Juan, Puerto Rico. Drug point owners, during the span of the conspiracy, purchased multi-kilogram quantities of narcotics and oversaw the transportation and sale of such narcotics at the drug points located within the Vista Hermosa Public Housing Project.

At various times during the course of the conspiracy, leader(s) possessed firearms and allowed members of the conspiracy to carry such firearms and ammunition in order to protect the drug distribution activities.

The following co-conspirators acted as leaders and/or drug point owners:

[1] JARET NAVEDO-MELÉNDEZ, a/k/a "Fifty", "El Negro", "El Feo", "La Negra", "Yaret Navedo-Melendez" acted as one of the main leaders of the drug trafficking organization,

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where he controlled, through co-defendants also acting as leaders, the drug distribution points located at the Vista Hermosa Public Housing Project. He directly supervised the operations at the Vista Hermosa Public Housing Project and other areas nearby, received the proceeds from the distribution of narcotics sold during the span of his leadership in the conspiracy and was in charge of maintaining control of all the drug distribution activities. He had approval authority as to the discipline to be imposed upon residents of the Vista Hermosa Public Housing Project, the members of the conspiracy, as well as its enemies and rivals. He was also a drug point owner within Vista Hermosa Public Housing Project. In addition to collecting proceeds from the sale of controlled substances under his seal/logo/sticker, he would also receive payment or "rent" from other drug points within the conspiracy. [1] **JARET NAVEDO-MELÉNDEZ, a/k/a "Fifty", "El Negro", "El Feo", "La Negra", "Yaret Navedo-Melendez"** did not often make appearances at Vista Hermosa Public Housing Project, and when he did, it was customarily for short periods of time in order to conduct meetings with members of the drug trafficking organization. Among other reasons, he also appeared at Vista Hermosa when in order to discipline or punish (known as "*cobrar falla*" in Spanish) residents or members of the drug trafficking organization for breaking one of the rules. In his absence, high level leaders of the drug trafficking organization would discipline or punish violators on his behalf. High level leaders would also receive drug point payments on his behalf. He was armed with firearms on a regular basis, especially when visiting Vista Hermosa Public Housing Project. In addition to carrying and using firearms during and in relation to drug trafficking activities, he would allow other members of the conspiracy to carry and use firearms during and in relation to drug trafficking activities.

[2] **JULIO GONZÁLEZ-BURGOS, a/k/a "Piti", "Pitipua", "Tito"**, was also a leader in the drug trafficking organization. He had an active role in the administration and daily operations of the drug point at Vista Hermosa Public Housing Project. At some point, he was the owner of one of the

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seals/stickers/logos being sold at one of the drug points within Vista Hermosa Public Housing Project. As someone who oversaw the administration of the drug trafficking organization, he was also responsible for disciplining Vista Hermosa residents, as well as members of the drug trafficking organization when the rules were not followed. He would also act as an enforcer within the conspiracy. As an enforcer, he would carry and use firearms during and in relation to drug trafficking activities and would allow other members of the conspiracy to carry and use firearms during and in relation to drug trafficking activities. He used firearms in order to protect members of the Vista Hermosa drug trafficking organization from rival drug trafficking gang members. He was also one of the individuals who were permitted to discipline or punish (known as "*cobrar falla*" in Spanish) Vista Hermosa Public Housing Project residents or members of the drug trafficking organization for violating any of the rules.

[3] **JOSÉ DAVIER CARVENTE-GUZMÁN, a/k/a "Davo"**, acted as a drug point owner and leader for the drug trafficking organization. He would administer and maintain order within the Vista Hermosa Public Housing Project. He was also a known enforcer within the drug trafficking organization. As an enforcer, he would carry and use firearms during and in relation to the drug trafficking activities and would allow other members of the conspiracy to carry and use firearms during and in relation to drug trafficking activities. He used firearms in order to protect members of the Vista Hermosa drug trafficking organization from rival drug trafficking gang members. He was also one of the individuals who were permitted to discipline or punish (known as "*cobrar falla*" in Spanish) Vista Hermosa Public Housing Project residents or members of the drug trafficking organization for violating any of the rules.

[4] **KILPATRICK ACOSTA-CRUZ, a/k/a "Kilpa"**, acted as a disciplinary leader of the drug trafficking organization. He would administer and maintain order within the Vista Hermosa

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Public Housing Project. He was also an enforcer within the drug trafficking organization. As an enforcer, he would carry and use firearms during and in relation to drug trafficking activities and would allow other members of the conspiracy to carry and use firearms during and in relation to drug trafficking activities. He used firearms in order to protect members of the Vista Hermosa drug trafficking organization from rival drug trafficking gang members. He was also one of the individuals who were permitted to discipline or punish (known as "*cobrar falla*" in Spanish) Vista Hermosa Public Housing Project residents or members of the drug trafficking organization for violating any of the rules.

[5] **SERGIO E. SANTA-OTERO, a/k/a "Bebo Sergio"**, acted as a drug point owner for the drug trafficking organization. He would administer and maintain order within the Vista Hermosa Public Housing Project. He was also an enforcer within the drug trafficking organization. As an enforcer, he would carry and use firearms during and in relation to drug trafficking activities and would allow other members of the conspiracy to carry and use firearms during and in relation to drug trafficking activities. He used firearms in order to protect members of the Vista Hermosa drug trafficking organization from rival drug trafficking gang members. He was also one of the individuals who were permitted to discipline or punish (known as "*cobrar falla*" in Spanish) Vista Hermosa Public Housing Project residents or members of the drug trafficking organization for violating any of the rules.

[6] **JEANCRISTH N. REYES-MASSO**, acted as a drug point owner and runner for the drug trafficking organization. He would often times be known to act as a runner for the controlled substances in his own drug point. If necessary, he would also sell controlled substances. As a drug point owner, he would carry and use firearms during and in relation to the drug trafficking activities. He has also processed controlled substances that were to be sold at Vista Hermosa Public Housing

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Project. He often times possessed a firearms. He would carry and use firearms during and in relation to drug trafficking activities.

[7] **CARLOS R. HERNÁNDEZ-RODRÍGUEZ, a/k/a "Vitolo"**, acted as the leader of the lookouts. It was his responsibility to assign shifts, manage the location(s) from which the lookouts are positioned, to ensure the lookouts were equipped with appropriate tools, etc. He would also collect a fee of \$10.00 (known as the "*prote*" in Spanish) from each seller within Vista Hermosa Public Housing Project per shift in order to pay for the security provided by the lookouts. He also collected \$100.00 a week from each drug point owner (seal/logo/sticker) as part of the rent that was to be provided to the leader(s). He was also a drug point owner within the drug trafficking organization. He has also carried and used firearms during and in relation to drug trafficking activities.

[8] **ÁNGEL ROMAN-AYALA, a/k/a "Botija"**, acted as a drug point owner for the drug trafficking organization. He would also act as a runner within the conspiracy for the controlled substances sold under his own seal, as well as controlled substances under another seal.

[9] **JESSENIA DÍAZ-COLÓN, a/k/a "Yeya"**, acted as a drug point owner for the drug trafficking organization. She was the owner of one of the drug points that sold prescription pills. She was responsible for supplying her drug point with varying types of prescription pills.

[10] **ELBA IRIS ESTRADA-NEGRÓN**, acted as a drug point owner for the drug trafficking organization. She was the owner of one of the drug points that sold prescription pills. She was responsible for supplying her drug point with varying types of prescription pills.

[11] **RAFAEL O. ÁLVAREZ-CRUZ, a/k/a "Rafa"**, acted as a drug point owner for the drug trafficking organization. In addition to being a drug point owner, he was also a runner within the conspiracy. At some point, he also acted as a seller for the drug trafficking organization.

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[12] NOEL MANZANO-CINTRÓN, a/k/a "Gordo Sacha", acted as a drug point owner for the drug trafficking organization. He would administer and maintain order within the Vista Hermosa Public Housing Project. He was also an enforcer within the drug trafficking organization. As an enforcer, he would carry and use firearms during and in relation to drug trafficking activities and would allow other members of the conspiracy to carry and use firearms during and in relation to drug trafficking activities. He has used firearms in order to protect members of the Vista Hermosa drug trafficking organization from rival drug trafficking gang members. He was also one of the individuals who were permitted to discipline or punish (known as "*cobrar falla*" in Spanish) Vista Hermosa Public Housing Project residents or members of the drug trafficking organization for violating any of the rules.

[13] CARLOS LUIS HERNÁNDEZ-RODRÍGUEZ, a/k/a "Bebo Cucaracha", acted as a drug point owner for the drug trafficking organization. He would often act as a runner within the conspiracy. At some point, he also acted as a seller for the drug trafficking organization. He would carry and use firearms during and in relation to drug trafficking activities. He was also one of the individuals who were permitted to discipline or punish (known as "*cobrar falla*" in Spanish) Vista Hermosa Public Housing Project residents or members of the drug trafficking organization for violating any of the rules.

[14] FNU LNU, a/k/a "Alex Tota", acted as a drug point owner for the drug trafficking organization. He would carry and use firearms during and in relation to drug trafficking activities. He was also one of the individuals who were permitted to discipline or punish (known as "*cobrar falla*" in Spanish) Vista Hermosa Public Housing Project residents or members of the drug trafficking organization for violating any of the rules.

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B. Enforcers:

Enforcers did possess, carry, brandish, use and discharge firearms to protect the leaders and members of the drug trafficking organization, the narcotics, the proceeds derived from their sales, and to further accomplish the goals of the conspiracy. Enforcers often acted upon instructions given by the leader(s) of this organization. Enforcers would often provide protection to the drug trafficking organization's drug distribution points. In addition to the above-mentioned leaders and drug point owners who also acted as enforcers, the following individuals and others known and unknown to the Grand Jury, acted as enforcers for the above-described drug trafficking organization:

[15] **KENNY J. RODRÍGUEZ-RODRÍGUEZ, a/k/a "Kenny Kencho"**, acted as an enforcer for the drug trafficking organization. As an enforcer, he would carry and use firearms during and in relation to drug trafficking activities. Additionally, he would often act as a seller within the conspiracy. At one point he was also a drug point owner. He was also one of the individuals who were permitted to discipline or punish (known as "*cobrar falla*" in Spanish) Vista Hermosa Public Housing Project residents or members of the drug trafficking organization for violating any of the rules.

[16] **LUIS A. RÍOS-PÉREZ, a/k/a "Luis el Quemao"**, acted as an enforcer for the drug trafficking organization. As an enforcer, he would carry and use firearms during and in relation to drug trafficking activities. Additionally, he would often act as a seller and runner within the conspiracy. At one point he was also a drug point owner. He was also one of the individuals who were permitted to discipline or punish (known as "*cobrar falla*" in Spanish) Vista Hermosa Public Housing Project residents or members of the drug trafficking organization for violating any of the rules.

[17] **ANÍBAL GONZÁLEZ-BURGOS, a/k/a "Ñengo"**, acted as an enforcer for the drug trafficking organization. As an enforcer, he would carry and use firearms during and in relation to drug trafficking activities. Additionally, he would often act as a seller and runner within the conspiracy. He

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was also one of the individuals who were permitted to discipline or punish (known as "*cobrar falla*" in Spanish) Vista Hermosa Public Housing Project residents or members of the drug trafficking organization for violating any of the rules.

[18] **JOEL OZUNA-RIVERA**, acted as an enforcer for the drug trafficking organization. As an enforcer, he would carry and use firearms during and in relation to drug trafficking activities. At one point he was also a drug point owner. He was also one of the individuals who were permitted to discipline or punish (known as "*cobrar falla*" in Spanish) Vista Hermosa Public Housing Project residents or members of the drug trafficking organization for violating any of the rules.

[19] **ROBERTO ROMERO-RIVERA, a/k/a "Wiñi"**, acted as an enforcer for the drug trafficking organization. As an enforcer, he would carry and use firearms during and in relation to drug trafficking activities. Additionally, he would often act as a runner within the conspiracy. He was also one of the individuals who were permitted to discipline or punish (known as "*cobrar falla*" in Spanish) Vista Hermosa Public Housing Project residents or members of the drug trafficking organization for violating any of the rules.

[20] **ABRAHAM MARCANO-MELÉNDEZ**, acted as an enforcer for the drug trafficking organization. As an enforcer, he would carry and use firearms during and in relation to drug trafficking activities. Additionally, he would often act as a seller and runner within the conspiracy. He was also one of the individuals who were permitted to discipline or punish (known as "*cobrar falla*" in Spanish) Vista Hermosa Public Housing Project residents or members of the drug trafficking organization for violating any of the rules.

C. Drug Processors:

Drug processors would meet under the direction of the leaders and drug point owners of the drug trafficking organization at different places inside or outside Vista Hermosa Public Housing

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Project within or near the Municipality of San Juan in order to weigh, "cut", mix, and prepare the controlled substances for street distribution. They would also package the heroin, crack, cocaine and marihuana in single dosage amounts and in distinctive "baggies", "decks" and/or "vials".

In addition to the above-mentioned leaders, drug point owners, and enforcers who also acted as drug processors, the following individuals and others known and unknown to the Grand Jury, acted as drug processors for the above described drug trafficking organization:

[21] **BENJAMIN SANTANA-GARCÍA, a/k/a "Benji Raton"**, acted as a drug processor for the drug trafficking organization. Additionally, he would often act as a seller and runner within the conspiracy. At one point he was also a drug point owner. He would also carry and use firearm(s) during and in relation to drug trafficking activities.

[22] **FREDDY LÓPEZ-PÉREZ**, acted as a drug processor for the drug trafficking organization. Additionally, he would often act as a seller and runner within the conspiracy. At one point he was also a drug point owner.

D. Runners:

The runners worked under the direct supervision of the leaders of the drug trafficking organization. They were responsible for providing sufficient narcotics to the sellers for further distribution at the drug point. They were also responsible for collecting the proceeds of drug sales and paying the street sellers. They would also supervise and make sure that there were street sellers for every shift of the drug point. They would make schedules and prepare ledgers to maintain accountability of the sales of the narcotics sold at the drug point. At various times, they would be responsible for recruiting street sellers and additional runners. The runners had a supervisory role within the conspiracy, as they would directly supervise on a daily basis, the activities of multiple sellers, and the daily activities of the drug points.

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In addition to the leaders, drug point owners, enforcers, and drug processors who also acted as runners, the following individuals and others known and unknown to this Grand Jury, acted as runners for the drug trafficking organization:

[23] **ALEXANDER PALOMARES-ORTÍZ, a/k/a "Palomares", "Palo"**, acted as a runner for the drug trafficking organization. Additionally, he would also carry and use firearms during and in relation to drug trafficking activities. At some point, he was one of the individuals who were permitted to discipline or punish (known as "*cobrar falla*" in Spanish) Vista Hermosa Public Housing Project residents or members of the drug trafficking organization for violating any of the rules.

[24] **ÁNGEL REYES-COLÓN**, acted as a runner for the drug trafficking organization. Additionally, he would also carry and use firearms during and in relation to drug trafficking activities. Additionally, he would often act as a seller within the conspiracy.

[25] **JOSHUA CAMPOS**, acted as a runner for the drug trafficking organization. Additionally, he would also carry and use firearms during and in relation to drug trafficking activities. At some point, he was also a drug point owner.

[26] **BRENDA IVELISSE RÍOS-PÉREZ**, acted as a runner for the drug trafficking organization. Additionally, she would sometimes act as a seller within the conspiracy.

[27] **EDWIN AMILL ROJAS, a/k/a "Wiwi"**, acted as a runner for the drug trafficking organization.

[28] **JOSEPH MARTÍNEZ-ÁVILA, a/k/a "Gordo"**, acted as a runner for the drug trafficking organization. Additionally, he would sometimes act as a seller within the conspiracy.

[29] **VICTOR A. FÉLIX-MORALES, a/k/a "Victor Maribella"**, acted as a runner for the drug trafficking organization. Additionally, he would sometimes act as a seller within the conspiracy.

[30] **MARK ANTHONY MONTANER-MELÉNDEZ, a/k/a "Mikey"**, acted as a runner for

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the drug trafficking organization. Additionally, he would sometimes act as a seller within the conspiracy. At some point, he was also a drug point owner.

[31] **KIDANY GUERRA-VIZCARRONDO**, acted as a runner for the drug trafficking organization. Additionally, he would sometimes act as a seller within the conspiracy.

E. Sellers:

The sellers would distribute street quantity amounts of heroin, crack cocaine, cocaine, marijuana, Oxycodone (commonly known as Percocet), and Alprazolam (commonly known as Xanax). As sellers, they were accountable for the drug proceeds and the narcotics sold at the drug distribution points. At times, sellers would use two-way radios ("walkie-talkies", "scanners") or cellular phones in order to communicate with other members of the conspiracy.

In addition to the above-mentioned leaders, drug point owners, enforcers, drug processors, and runners who also acted as sellers, the following individuals and others known and unknown to the Grand Jury, acted as sellers for the above described drug trafficking organization:

- [32] **SAMUEL URBINA-ORTÍZ**, a/k/a "Tweety",
- [33] **FELICIA EDWARDS**, a/k/a "La Negra",
- [34] **WILLIAM HOMMY BACHIER-FEBRES**, a/k/a "Mono",
- [35] **PEDRO LUIS HERNÁNDEZ-RODRÍGUEZ**, a/k/a "Rasta",
- [36] **BLANCA AURORA CALO-VÁZQUEZ**, a/k/a "Blanquita",
- [37] **MIGUEL DEL VALLE-LÓPEZ**, a/k/a "Maiky",
- [38] **FNU LNU**, a/k/a "La Perri",
- [39] **IVÁN J. MATOS-MORALES**, a/k/a "Ojos Bellos",
- [40] **ZULMA RIVERA-BENÍTES**,
- [41] **GISARO JAVIER PÉREZ-CASTRO**, a/k/a "Bebo Monacillo", "Indio", "Mejicano",
- [42] **CHRISTOPHER ANDINO-ARROYO**, a/k/a "Bemba",
- [43] **JOSÉ A. VÁZQUEZ-ROSARIO**, a/k/a "Mazuso",
- [44] **EZEQUIEL CORTÉZ-RODRÍGUEZ**,
- [45] **ERICK MANUEL ANDRADES-TORRES**, a/k/a "Coquito",
- [46] **ÁNGEL L. QUINTANA-MORENO**, a/k/a "Quintana",
- [47] **MOISES GONZÁLEZ-PADILLA**,
- [48] **JOEL PERILLO-BORRERO**, a/k/a "Clifford",
- [49] **JUAN MANUEL SANTIAGO**, a/k/a "Juanma", "Chucky",
- [50] **KAREN RIVERA-FIGUEROA**, a/k/a "Aloha",

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- [51] JOSÉ A. LÓPEZ-MAGRIS, a/k/a "Cirilo",
- [52] WILLIAM RÍOS-RIVERA, a/k/a "Jordan",
- [53] JOSÉ ABRAHAM MARTÍNEZ-CASTRO, a/k/a "Abran", "Negro",
- [54] CARLOS GÓMEZ, a/k/a "Anyu",
- [55] JUAN M. QUIROZ-GUTIÉRREZ,
- [56] FRANCHELY MARTÍNEZ-CASTRO,
- [57] ALEXIS CALO-VÁZQUEZ, a/k/a "Calo",
- [58] LUZ MARÍA COLÓN-MARTÍNEZ,
- [59] JOSÉ ENRIQUE BATISTA, a/k/a "Pitillo",
- [60] RAMÓN ESTEBAN SOBERAL-PÉREZ, a/k/a "Jordan",
- [61] BABE RÍOS-FUENTES,
- [62] CHRISTOPHER MAYSONET-GARCÍA,
- [63] ROSEMARY RODRÍGUEZ-CABRERA,
- [64] JOHN FONTÁNEZ-GONZÁLEZ, a/k/a "Johnny Fontáñez-Gonzalez", "Chopa",
- [65] MELVIN DÍAZ-ALLENDE, a/k/a "Barba",
- [66] JOHN ANTHONY ROLDAN-COLÓN,
- [67] MARÍA IVELISSE VALCARCEL, a/k/a "Chory", "Shorty",
- [68] GÉNESIS LIZETTE RUÍZ-LUGO, a/k/a "La China",
- [69] KEVIN WILLIAM PEÑA, a/k/a "Gringo",
- [70] RAÚL JULIÁN GALARZA-ROSADO, a/k/a "Lilo",
- [71] JONATHAN ALBÍZU-SANTIAGO,

F. Facilitators

"Facilitators" would allow the use of their residences in order to process, store, and package narcotics, paraphernalia, firearms, and ammunition. Facilitators would additionally deliver monies and drugs, to and from the drug point owners, runners, and sellers; they often served as messengers for members of the conspiracy; and would often serve as intermediaries during drug transactions.

The following co-defendants at some point during their participation in the conspiracy did act as facilitators for the above-described drug trafficking organization:

[72] RAFAEL TORRES-VÁZQUEZ, a/k/a "Swepchup", stored controlled substances, firearms, ammunition, drug ledgers, drug trafficking proceeds, and other records and equipment of the drug trafficking organization.

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COUNT TWO

(Aiding and Abetting in the Possession with Intent to Distribute Heroin)

Beginning on a date unknown, but no later than in or about the year 2012, and continuing up to and until the return of the instant Indictment, in the Municipality of San Juan, District of Puerto Rico and within the jurisdiction of this Court,

- [1] JARET NAVEDO-MELÉNDEZ, a/k/a "Fifty", "El Negro", "El Feo", "La Negra", "Yaret Navedo-Melendez"
- [2] JULIO GONZÁLEZ-BURGOS, a/k/a "Piti", "Pitipua", "Tito",
- [3] JOSÉ DAVIER CARVENTE-GUZMÁN, a/k/a "Davo",
- [4] KILPATRICK ACOSTA-CRUZ, a/k/a "Kilpa",
- [5] SERGIO E. SANTA-OTERO, a/k/a "Bebo Sergio",
- [6] JEANCRISTH N. REYES-MASSO,
- [7] CARLOS R. HERNÁNDEZ-RODRÍGUEZ, a/k/a "Vitolo",
- [8] ÁNGEL ROMAN-AYALA, a/k/a "Botija",
- [9] JESSENIA DÍAZ-COLÓN, a/k/a "Yeya",
- [10] ELBA IRIS ESTRADA-NEGRÓN,
- [11] RAFAEL O. ÁLVAREZ-CRUZ, a/k/a "Rafa",
- [12] NOEL MANZANO-CINTRÓN, a/k/a "Gordo Sacha",
- [13] CARLOS LUIS HERNÁNDEZ-RODRÍGUEZ, a/k/a "Bebo Cucaracha",
- [14] FNU LNU, a/k/a "Alex Tota",
- [15] KENNY J. RODRÍGUEZ-RODRÍGUEZ, a/k/a "Kenny Kencho",
- [16] LUIS A. RÍOS-PÉREZ, a/k/a "Luis el Quemao",
- [17] ANÍBAL GONZÁLEZ-BURGOS, a/k/a "Ñengo",
- [18] JOEL OZUNA-RIVERA,
- [19] ROBERTO ROMERO-RIVERA, a/k/a "Wiñi",
- [20] ABRAHAM MARCANO-MELÉNDEZ,
- [21] BENJAMIN SANTANA-GARCÍA, a/k/a "Benji Raton",
- [22] FREDDY LÓPEZ-PÉREZ,
- [23] ALEXANDER PALOMARES-ORTÍZ, a/k/a "Palomares", "Palo",
- [24] ÁNGEL REYES-COLÓN,
- [25] JOSHUA CAMPOS,
- [26] BRENDA IVELISSE RÍOS-PÉREZ,
- [27] EDWIN AMILL ROJAS, a/k/a "Wiwi",
- [28] JOSEPH MARTÍNEZ-ÁVILA, a/k/a "Gordo",
- [29] VICTOR A. FÉLIX-MORALES, a/k/a "Victor Maribella",
- [30] MARK ANTHONY MONTANER-MELÉNDEZ, a/k/a "Mikey",
- [31] KIDANY GUERRA-VIZCARRONDO,
- [32] SAMUEL URBINA-ORTÍZ, a/k/a "Tweety",

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- [33] FELICIA EDWARDS, a/k/a "La Negra",
- [34] WILLIAM HOMMY BACHIER-FEBRES, a/k/a "Mono",
- [35] PEDRO LUIS HERNÁNDEZ-RODRÍGUEZ, a/k/a "Rasta",
- [36] BLANCA AURORA CALO-VÁZQUEZ, a/k/a "Blanquita",
- [37] MIGUEL DEL VALLE-LÓPEZ, a/k/a "Maiky",
- [38] FNU LNU, a/k/a "La Perri",
- [39] IVÁN J. MATOS-MORALES, a/k/a "Ojos Bellos",
- [40] ZULMA RIVERA-BENÍTES,
- [41] GISARO JAVIER PÉREZ-CASTRO, a/k/a "Bebo Monacillo", "Indio", "Mejicano",
- [42] CHRISTOPHER ANDINO-ARROYO, a/k/a "Bemba",
- [43] JOSÉ A. VÁZQUEZ-ROSARIO, a/k/a "Mazuso",
- [44] EZEQUIEL CORTÉZ-RODRÍGUEZ,
- [45] ERICK MANUEL ANDRADES-TORRES, a/k/a "Coquito",
- [46] ÁNGEL L. QUINTANA-MORENO, a/k/a "Quintana",
- [47] MOISES GONZÁLEZ-PADILLA,
- [48] JOEL PERILLO-BORRERO, a/k/a "Clifford",
- [49] JUAN MANUEL SANTIAGO, a/k/a "Juanma", "Chucky",
- [50] KAREN RIVERA-FIGUEROA, a/k/a "Aloha",
- [51] JOSÉ A. LÓPEZ-MAGRIS, a/k/a "Cirilo",
- [52] WILLIAM RÍOS-RIVERA, a/k/a "Jordan",
- [53] JOSÉ ABRAHAM MARTÍNEZ-CASTRO, a/k/a "Abran", "Negro",
- [54] CARLOS GÓMEZ, a/k/a "Anyu",
- [55] JUAN M. QUIROZ-GUTIÉRREZ,
- [56] FRANCHELY MARTÍNEZ-CASTRO,
- [57] ALEXIS CALO-VÁZQUEZ, a/k/a "Calo",
- [58] LUZ MARÍA COLÓN-MARTÍNEZ,
- [59] JOSÉ ENRIQUE BATISTA, a/k/a "Pitillo",
- [60] RAMÓN ESTEBAN SOBERAL-PÉREZ, a/k/a "Jordan",
- [61] BABE RÍOS-FUENTES,
- [62] CHRISTOPHER MAYSONET-GARCÍA,
- [63] ROSEMARY RODRÍGUEZ-CABRERA,
- [64] JOHN FONTÁNEZ-GONZÁLEZ, a/k/a "Johnny Fontánez-Gonzalez", "Chopa",
- [65] MELVIN DÍAZ-ALLENDE, a/k/a "Barba",
- [66] JOHN ANTHONY ROLDAN-COLÓN,
- [67] MARÍA IVELISSE VALCARCEL, a/k/a "Chory", "Shorty",
- [68] GÉNESIS LIZETTE RUÍZ-LUGO, a/k/a "La China",
- [69] KEVIN WILLIAM PEÑA, a/k/a "Gringo",
- [70] RAÚL JULIÁN GALARZA-ROSADO, a/k/a "Lilo",
- [71] JONATHAN ALBÍZU-SANTIAGO,
- [72] RAFAEL TORRES-VÁZQUEZ, a/k/a "Swepchup",

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the defendants herein, aiding and abetting each other, did knowingly and intentionally possess with intent to distribute one (1) kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Narcotic Drug Controlled Substance, within one thousand (1,000) feet of a real property comprising the Vista Hermosa Public Housing Project, a housing facility owned by a public housing authority, within one thousand (1,000) feet of a real property comprising a public or private elementary, vocational, or secondary school, and within one thousand (1,000) feet of a playground, all within the Municipality of San Juan, Puerto Rico. All in violation of Title 21, *United States Code*, §§ 841(a)(1), 860; and Title 18, *United States Code*, § 2.

COUNT THREE

(Aiding and Abetting in the Possession with Intent to Distribute Cocaine Base)

Beginning on a date unknown, but no later than in or about the year 2012, and continuing up to and until the return of the instant Indictment, in the Municipality of San Juan, District of Puerto Rico and within the jurisdiction of this Court,

[1] JARET NAVEDO-MELÉNDEZ, a/k/a "Fifty", "El Negro", "El Feo", "La Negra", "Yaret Navedo-Melendez"

[2] JULIO GONZÁLEZ-BURGOS, a/k/a "Piti", "Pitipua", "Tito",

[3] JOSÉ DAVIER CARVENTE-GUZMÁN, a/k/a "Davo",

[4] KILPATRICK ACOSTA-CRUZ, a/k/a "Kilpa",

[5] SERGIO E. SANTA-OTERO, a/k/a "Bebo Sergio",

[6] JEANCRISTH N. REYES-MASSO,

[7] CARLOS R. HERNÁNDEZ-RODRÍGUEZ, a/k/a "Vitolo",

[8] ÁNGEL ROMAN-AYALA, a/k/a "Botija",

[9] JESSENIA DÍAZ-COLÓN, a/k/a "Yeya",

[10] ELBA IRIS ESTRADA-NEGRÓN,

[11] RAFAEL O. ÁLVAREZ-CRUZ, a/k/a "Rafa",

[12] NOEL MANZANO-CINTRÓN, a/k/a "Gordo Sacha",

[13] CARLOS LUIS HERNÁNDEZ-RODRÍGUEZ, a/k/a "Bebo Cucaracha",

[14] FNU LNU, a/k/a "Alex Tota",

[15] KENNY J. RODRÍGUEZ-RODRÍGUEZ, a/k/a "Kenny Kencho",

[16] LUIS A. RÍOS-PÉREZ, a/k/a "Luis el Quemao",

[17] ANÍBAL GONZÁLEZ-BURGOS, a/k/a "Ñengo",

[18] JOEL OZUNA-RIVERA,

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- [19] ROBERTO ROMERO-RIVERA, a/k/a "Wiñi",
- [20] ABRAHAM MARCANO-MELÉNDEZ,
- [21] BENJAMIN SANTANA-GARCÍA, a/k/a "Benji Raton",
- [22] FREDDY LÓPEZ-PÉREZ,
- [23] ALEXANDER PALOMARES-ORTÍZ, a/k/a "Palomares", "Palo",
- [24] ÁNGEL REYES-COLÓN,
- [25] JOSHUA CAMPOS,
- [26] BRENDA IVELISSE RÍOS-PÉREZ,
- [27] EDWIN AMILL ROJAS, a/k/a "Wiwi",
- [28] JOSEPH MARTÍNEZ-ÁVILA, a/k/a "Gordo",
- [29] VICTOR A. FÉLIX-MORALES, a/k/a "Victor Maribella",
- [30] MARK ANTHONY MONTANER-MELÉNDEZ, a/k/a "Mikey",
- [31] KIDANY GUERRA-VIZCARRONDO,
- [32] SAMUEL URBINA-ORTÍZ, a/k/a "Tweety",
- [33] FELICIA EDWARDS, a/k/a "La Negra",
- [34] WILLIAM HOMMY BACHIER-FEBRES, a/k/a "Mono",
- [35] PEDRO LUIS HERNÁNDEZ-RODRÍGUEZ, a/k/a "Rasta",
- [36] BLANCA AURORA CALO-VÁZQUEZ, a/k/a "Blanquita",
- [37] MIGUEL DEL VALLE-LÓPEZ, a/k/a "Maiky",
- [38] FNU LNU, a/k/a "La Perri",
- [39] IVÁN J. MATOS-MORALES, a/k/a "Ojos Bellos",
- [40] ZULMA RIVERA-BENÍTES,
- [41] GISARO JAVIER PÉREZ-CASTRO, a/k/a "Bebo Monacillo", "Indio", "Mejicano",
- [42] CHRISTOPHER ANDINO-ARROYO, a/k/a "Bemba",
- [43] JOSÉ A. VÁZQUEZ-ROSARIO, a/k/a "Mazuso",
- [44] EZEQUIEL CORTÉZ-RODRÍGUEZ,
- [45] ERICK MANUEL ANDRADES-TORRES, a/k/a "Coquito",
- [46] ÁNGEL L. QUINTANA-MORENO, a/k/a "Quintana",
- [47] MOISES GONZÁLEZ-PADILLA,
- [48] JOEL PERILLO-BORRERO, a/k/a "Clifford",
- [49] JUAN MANUEL SANTIAGO, a/k/a "Juanma", "Chucky",
- [50] KAREN RIVERA-FIGUEROA, a/k/a "Aloha",
- [51] JOSÉ A. LÓPEZ-MAGRIS, a/k/a "Cirilo",
- [52] WILLIAM RÍOS-RIVERA, a/k/a "Jordan",
- [53] JOSÉ ABRAHAM MARTÍNEZ-CASTRO, a/k/a "Abran", "Negro",
- [54] CARLOS GÓMEZ, a/k/a "Anyu",
- [55] JUAN M. QUIROZ-GUTIÉRREZ,
- [56] FRANCHELY MARTÍNEZ-CASTRO,
- [57] ALEXIS CALO-VÁZQUEZ, a/k/a "Calo",
- [58] LUZ MARÍA COLÓN-MARTÍNEZ,

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[59] JOSÉ ENRIQUE BATISTA, a/k/a "Pitillo",
[60] RAMÓN ESTEBAN SOBERAL-PÉREZ, a/k/a "Jordan",
[61] BABE RÍOS-FUENTES,
[62] CHRISTOPHER MAYSONET-GARCÍA,
[63] ROSEMARY RODRÍGUEZ-CABRERA,
[64] JOHN FONTÁNEZ-GONZÁLEZ, a/k/a "Johnny Fontáñez-Gonzalez", "Chopa",
[65] MELVIN DÍAZ-ALLENDE, a/k/a "Barba",
[66] JOHN ANTHONY ROLDAN-COLÓN,
[67] MARÍA IVELISSE VALCARCEL, a/k/a "Chory", "Shorty",
[68] GÉNESIS LIZETTE RUÍZ-LUGO, a/k/a "La China",
[69] KEVIN WILLIAM PEÑA, a/k/a "Gringo",
[70] RAÚL JULIÁN GALARZA-ROSADO, a/k/a "Lilo",
[71] JONATHAN ALBÍZU-SANTIAGO,
[72] RAFAEL TORRES-VÁZQUEZ, a/k/a "Swepchup",

the defendants herein, aiding and abetting each other, did knowingly and intentionally possess with intent to distribute two hundred and eighty (280) grams or more of a mixture or substance containing a detectable amount of cocaine base (Crack), a Schedule II Narcotic Drug Controlled Substance, within one thousand (1,000) feet of a real property comprising the Vista Hermosa Public Housing Project, a housing facility owned by a public housing authority, within one thousand (1,000) feet of a real property comprising a public or private elementary, vocational, or secondary school, and within one thousand (1,000) feet of a playground, all within the Municipality of San Juan, Puerto Rico. All in violation of Title 21, *United States Code*, §§ 841(a)(1), 860; and Title 18, *United States Code*, § 2.

COUNT FOUR

(Aiding and Abetting in the Possession with Intent to Distribute Cocaine)

Beginning on a date unknown, but no later than in or about the year 2012, and continuing up to and until the return of the instant Indictment, in the Municipality of San Juan, District of Puerto Rico and within the jurisdiction of this Court,

[1] JARET NAVEDO-MELÉNDEZ, a/k/a "Fifty", "El Negro", "El Feo", "La Negra", "Yaret Navedo-Melendez"

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- [2] JULIO GONZÁLEZ-BURGOS, a/k/a "Piti", "Pitipua", "Tito",
- [3] JOSÉ DAVIER CARVENTE-GUZMÁN, a/k/a "Davo",
- [4] KILPATRICK ACOSTA-CRUZ, a/k/a "Kilpa",
- [5] SERGIO E. SANTA-OTERO, a/k/a "Bebo Sergio",
- [6] JEANCRISTH N. REYES-MASSO,
- [7] CARLOS R. HERNÁNDEZ-RODRÍGUEZ, a/k/a "Vitolo",
- [8] ÁNGEL ROMAN-AYALA, a/k/a "Botija",
- [9] JESSENIA DÍAZ-COLÓN, a/k/a "Yeya",
- [10] ELBA IRIS ESTRADA-NEGRÓN,
- [11] RAFAEL O. ÁLVAREZ-CRUZ, a/k/a "Rafa",
- [12] NOEL MANZANO-CINTRÓN, a/k/a "Gordo Sacha",
- [13] CARLOS LUIS HERNÁNDEZ-RODRÍGUEZ, a/k/a "Bebo Cucaracha",
- [14] FNU LNU, a/k/a "Alex Tota",
- [15] KENNY J. RODRÍGUEZ-RODRÍGUEZ, a/k/a "Kenny Kencho",
- [16] LUIS A. RÍOS-PÉREZ, a/k/a "Luis el Quemao",
- [17] ANÍBAL GONZÁLEZ-BURGOS, a/k/a "Ñengo",
- [18] JOEL OZUNA-RIVERA,
- [19] ROBERTO ROMERO-RIVERA, a/k/a "Wiñi",
- [20] ABRAHAM MARCANO-MELÉNDEZ,
- [21] BENJAMIN SANTANA-GARCÍA, a/k/a "Benji Raton",
- [22] FREDDY LÓPEZ-PÉREZ,
- [23] ALEXANDER PALOMARES-ORTÍZ, a/k/a "Palomares", "Palo",
- [24] ÁNGEL REYES-COLÓN,
- [25] JOSHUA CAMPOS,
- [26] BRENDA IVELISSE RÍOS-PÉREZ,
- [27] EDWIN AMILL ROJAS, a/k/a "Wiwi",
- [28] JOSEPH MARTÍNEZ-ÁVILA, a/k/a "Gordo",
- [29] VICTOR A. FÉLIX-MORALES, a/k/a "Victor Maribella",
- [30] MARK ANTHONY MONTANER-MELÉNDEZ, a/k/a "Mikey",
- [31] KIDANY GUERRA-VIZCARRONDO,
- [32] SAMUEL URBINA-ORTÍZ, a/k/a "Tweety",
- [33] FELICIA EDWARDS, a/k/a "La Negra",
- [34] WILLIAM HOMMY BACHIER-FEBRES, a/k/a "Mono",
- [35] PEDRO LUIS HERNÁNDEZ-RODRÍGUEZ, a/k/a "Rasta",
- [36] BLANCA AURORA CALO-VÁZQUEZ, a/k/a "Blanquita",
- [37] MIGUEL DEL VALLE-LÓPEZ, a/k/a "Maiky",
- [38] FNU LNU, a/k/a "La Perri",
- [39] IVÁN J. MATOS-MORALES, a/k/a "Ojos Bellos",
- [40] ZULMA RIVERA-BENÍTES,
- [41] GISARO JAVIER PÉREZ-CASTRO, a/k/a "Bebo Monacillo", "Indio", "Mejicano",
- [42] CHRISTOPHER ANDINO-ARROYO, a/k/a "Bemba",
- [43] JOSÉ A. VÁZQUEZ-ROSARIO, a/k/a "Mazuso",

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- [44] EZEQUIEL CORTÉZ-RODRÍGUEZ,
- [45] ERICK MANUEL ANDRADES-TORRES, a/k/a "Coquito",
- [46] ÁNGEL L. QUINTANA-MORENO, a/k/a "Quintana",
- [47] MOISES GONZÁLEZ-PADILLA,
- [48] JOEL PERILLO-BORRERO, a/k/a "Clifford",
- [49] JUAN MANUEL SANTIAGO, a/k/a "Juanma", "Chucky",
- [50] KAREN RIVERA-FIGUEROA, a/k/a "Aloha",
- [51] JOSÉ A. LÓPEZ-MAGRIS, a/k/a "Cirilo",
- [52] WILLIAM RÍOS-RIVERA, a/k/a "Jordan",
- [53] JOSÉ ABRAHAM MARTÍNEZ-CASTRO, a/k/a "Abran", "Negro",
- [54] CARLOS GÓMEZ, a/k/a "Anyu",
- [55] JUAN M. QUIROZ-GUTIÉRREZ,
- [56] FRACHELY MARTÍNEZ-CASTRO,
- [57] ALEXIS CALO-VÁZQUEZ, a/k/a "Calo",
- [58] LUZ MARÍA COLÓN-MARTÍNEZ,
- [59] JOSÉ ENRIQUE BATISTA, a/k/a "Pitillo",
- [60] RAMÓN ESTEBAN SOBERAL-PÉREZ, a/k/a "Jordan",
- [61] BABE RÍOS-FUENTES,
- [62] CHRISTOPHER MAYSONET-GARCÍA,
- [63] ROSEMARY RODRÍGUEZ-CABRERA,
- [64] JOHN FONTÁNEZ-GONZÁLEZ, a/k/a "Johnny Fontáñez-Gonzalez", "Chopa",
- [65] MELVIN DÍAZ-ALLENDE, a/k/a "Barba",
- [66] JOHN ANTHONY ROLDAN-COLÓN,
- [67] MARÍA IVELISSE VALCARCEL, a/k/a "Chory", "Shorty",
- [68] GÉNESIS LIZETTE RUÍZ-LUGO, a/k/a "La China",
- [69] KEVIN WILLIAM PEÑA, a/k/a "Gringo",
- [70] RAÚL JULIÁN GALARZA-ROSADO, a/k/a "Lilo",
- [71] JONATHAN ALBÍZU-SANTIAGO,
- [72] RAFAEL TORRES-VÁZQUEZ, a/k/a "Swepchup",

the defendants herein, aiding and abetting each other, did knowingly and intentionally possess with intent to distribute five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II Narcotic Drug Controlled Substance, within one thousand (1,000) feet of a real property comprising the Vista Hermosa Public Housing Project, a housing facility owned by a public housing authority, within one thousand (1,000) feet of a real property comprising a public or private elementary, vocational, or secondary school, and within one thousand (1,000) feet of a

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playground, all within the Municipality of San Juan, Puerto Rico. All in violation of Title 21, *United States Code*, §§ 841(a)(1), 860; and Title 18, *United States Code*, § 2.

COUNT FIVE

(Aiding and Abetting in the Possession with Intent to Distribute Marijuana)

Beginning on a date unknown, but no later than in or about the year 2012, and continuing up to and until the return of the instant Indictment, in the Municipality of San Juan, District of Puerto Rico and within the jurisdiction of this Court,

- [1] JARET NAVEDO-MELÉNDEZ, a/k/a "Fifty", "El Negro", "El Feo", "La Negra", "Yaret Navedo-Melendez"
- [2] JULIO GONZÁLEZ-BURGOS, a/k/a "Piti", "Pitipua", "Tito",
- [3] JOSÉ DAVIER CARVENTE-GUZMÁN, a/k/a "Davo",
- [4] KILPATRICK ACOSTA-CRUZ, a/k/a "Kilpa",
- [5] SERGIO E. SANTA-OTERO, a/k/a "Bebo Sergio",
- [6] JEANCRISTH N. REYES-MASSO,
- [7] CARLOS R. HERNÁNDEZ-RODRÍGUEZ, a/k/a "Vitolo",
- [8] ÁNGEL ROMAN-AYALA, a/k/a "Botija",
- [9] JESSENIA DÍAZ-COLÓN, a/k/a "Yeya",
- [10] ELBA IRIS ESTRADA-NEGRÓN,
- [11] RAFAEL O. ÁLVAREZ-CRUZ, a/k/a "Rafa",
- [12] NOEL MANZANO-CINTRÓN, a/k/a "Gordo Sacha",
- [13] CARLOS LUIS HERNÁNDEZ-RODRÍGUEZ, a/k/a "Bebo Cucaracha",
- [14] FNU LNU, a/k/a "Alex Tota",
- [15] KENNY J. RODRÍGUEZ-RODRÍGUEZ, a/k/a "Kenny Kencho",
- [16] LUIS A. RÍOS-PÉREZ, a/k/a "Luis el Quemao",
- [17] ANÍBAL GONZÁLEZ-BURGOS, a/k/a "Ñengo",
- [18] JOEL OZUNA-RIVERA,
- [19] ROBERTO ROMERO-RIVERA, a/k/a "Wiñi",
- [20] ABRAHAM MARCANO-MELÉNDEZ,
- [21] BENJAMIN SANTANA-GARCÍA, a/k/a "Benji Raton",
- [22] FREDDY LÓPEZ-PÉREZ,
- [23] ALEXANDER PALOMARES-ORTÍZ, a/k/a "Palomares", "Palo",
- [24] ÁNGEL REYES-COLÓN,
- [25] JOSHUA CAMPOS,
- [26] BRENDA IVELISSE RÍOS-PÉREZ,
- [27] EDWIN AMILL ROJAS, a/k/a "Wiwi",
- [28] JOSEPH MARTÍNEZ-ÁVILA, a/k/a "Gordo",
- [29] VICTOR A. FÉLIX-MORALES, a/k/a "Victor Maribella",

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- [30] MARK ANTHONY MONTANER-MELÉNDEZ, a/k/a "Mikey",
- [31] KIDANY GUERRA-VIZCARRONDO,
- [32] SAMUEL URBINA-ORTÍZ, a/k/a "Tweety",
- [33] FELICIA EDWARDS, a/k/a "La Negra",
- [34] WILLIAM HOMMY BACHIER-FEBRES, a/k/a "Mono",
- [35] PEDRO LUIS HERNÁNDEZ-RODRÍGUEZ, a/k/a "Rasta",
- [36] BLANCA AURORA CALO-VÁZQUEZ, a/k/a "Blanquita",
- [37] MIGUEL DEL VALLE-LÓPEZ, a/k/a "Maiky",
- [38] FNU LNU, a/k/a "La Perri",
- [39] IVÁN J. MATOS-MORALES, a/k/a "Ojos Bellos",
- [40] ZULMA RIVERA-BENÍTES,
- [41] GISARO JAVIER PÉREZ-CASTRO, a/k/a "Bebo Monacillo", "Indio", "Mejicano",
- [42] CHRISTOPHER ANDINO-ARROYO, a/k/a "Bemba",
- [43] JOSÉ A. VÁZQUEZ-ROSARIO, a/k/a "Mazuso",
- [44] EZEQUIEL CORTÉZ-RODRÍGUEZ,
- [45] ERICK MANUEL ANDRADES-TORRES, a/k/a "Coquito",
- [46] ÁNGEL L. QUINTANA-MORENO, a/k/a "Quintana",
- [47] MOISES GONZÁLEZ-PADILLA,
- [48] JOEL PERILLO-BORRERO, a/k/a "Clifford",
- [49] JUAN MANUEL SANTIAGO, a/k/a "Juanma", "Chucky",
- [50] KAREN RIVERA-FIGUEROA, a/k/a "Aloha",
- [51] JOSÉ A. LÓPEZ-MAGRIS, a/k/a "Cirilo",
- [52] WILLIAM RÍOS-RIVERA, a/k/a "Jordan",
- [53] JOSÉ ABRAHAM MARTÍNEZ-CASTRO, a/k/a "Abran", "Negro",
- [54] CARLOS GÓMEZ, a/k/a "Anyu",
- [55] JUAN M. QUIROZ-GUTIÉRREZ,
- [56] FRANCHELY MARTÍNEZ-CASTRO,
- [57] ALEXIS CALO-VÁZQUEZ, a/k/a "Calo",
- [58] LUZ MARÍA COLÓN-MARTÍNEZ,
- [59] JOSÉ ENRIQUE BATISTA, a/k/a "Pitillo",
- [60] RAMÓN ESTEBAN SOBERAL-PÉREZ, a/k/a "Jordan",
- [61] BABE RÍOS-FUENTES,
- [62] CHRISTOPHER MAYSONET-GARCÍA,
- [63] ROSEMARY RODRÍGUEZ-CABRERA,
- [64] JOHN FONTÁNEZ-GONZÁLEZ, a/k/a "Johnny Fontánez-Gonzalez", "Chopa",
- [65] MELVIN DÍAZ-ALLENDE, a/k/a "Barba",
- [66] JOHN ANTHONY ROLDAN-COLÓN,
- [67] MARÍA IVELISSE VALCARCEL, a/k/a "Chory", "Shorty",
- [68] GÉNESIS LIZETTE RUÍZ-LUGO, a/k/a "La China",
- [69] KEVIN WILLIAM PEÑA, a/k/a "Gringo",

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[70] RAÚL JULIÁN GALARZA-ROSADO, a/k/a "Lilo",

[71] JONATHAN ALBÍZU-SANTIAGO,

[72] RAFAEL TORRES-VÁZQUEZ, a/k/a "Swepchup",

the defendants herein, aiding and abetting each other, did knowingly and intentionally possess with intent to distribute a mixture or substance containing a detectable amount of marijuana, a Schedule I Controlled Substance, within one thousand (1,000) feet of a real property comprising the Vista Hermosa Public Housing Project, a housing facility owned by a public housing authority, within one thousand (1,000) feet of a real property comprising a public or private elementary, vocational, or secondary school, and within one thousand (1,000) feet of a playground, all within the Municipality of San Juan, Puerto Rico. All in violation of Title 21, *United States Code*, §§ 841(a)(1)(b)(1)(D), 860; and Title 18, *United States Code*, § 2.

COUNT SIX

(Possessing a Firearm in Furtherance of a Drug Trafficking Crime)

Beginning on a date unknown, but no later than in or about the year 2012, and continuing up to and until the return of the instant Indictment, in the Municipality of San Juan, District of Puerto Rico and within the jurisdiction of this Court,

[1] JARET NAVEDO-MELÉNDEZ, a/k/a "Fifty", "El Negro", "El Feo", "La Negra", "Yaret Navedo-Melendez"

[2] JULIO GONZÁLEZ-BURGOS, a/k/a "Piti", "Pitipua", "Tito",

[3] JOSÉ DAVIER CARVENTE-GUZMÁN, a/k/a "Davo",

[4] KILPATRICK ACOSTA-CRUZ, a/k/a "Kilpa",

[5] SERGIO E. SANTA-OTERO, a/k/a "Bebo Sergio",

[15] KENNY J. RODRÍGUEZ-RODRÍGUEZ, a/k/a "Kenny Kencho",

[16] LUIS A. RÍOS-PÉREZ, a/k/a "Luis el Quemao",

[17] ANÍBAL GONZÁLEZ-BURGOS, a/k/a "Ñengo",

[18] JOEL OZUNA-RIVERA,

[19] ROBERTO ROMERO-RIVERA, a/k/a "Wiñi",

[20] ABRAHAM MARCANO-MELÉNDEZ,

the defendants herein and other persons known and unknown to the Grand Jury, aiding and abetting

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each other, did knowingly possess firearms, of unknown make and caliber, as that term is defined in Title 18, United States Code, Section 921(a)(3), in furtherance of a drug trafficking crime for which they may be prosecuted in a court of the United States, as charged in Count One of the instant Indictment. All in violation of Title 18, United States Code, Section 924(c)(1)(A) and 2.

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NARCOTICS FORFEITURE ALLEGATION

1. The allegations contained in Counts ONE through FIVE of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 21, *United States Code*, Section 853.

2. Pursuant to Title 21, *United States Code*, Section 853, upon conviction of an offense in violation of Title 21, *United States Code*, Section 841, all defendants named in the instant indictment, shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense(s) and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offense(s). The property to be forfeited includes, but is not limited to, a sum of money equal to the total amount of money involved in each offense, or conspiracy to commit such offense, for which the defendant is convicted, to wit: twenty-five million dollars (\$25,000,000.00) in U.S. Currency. If more than one defendant is convicted of an offense, the defendants so convicted are jointly and severally liable for the amount involved in such offense.

3. If any of the property described above, as a result of any act or omission of the defendant(s):

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

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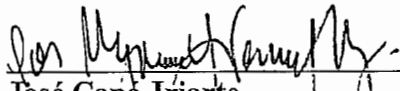
the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21,
United States Code, Section 853(p).

TRUE BILL

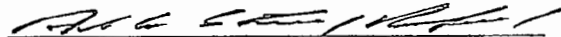
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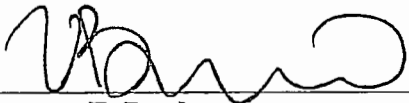
ROSA EMILIA RODRÍGUEZ-VELEZ
United States Attorney



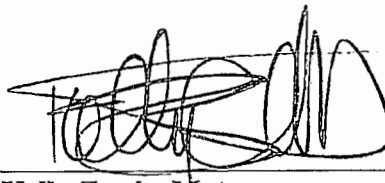
José Capó-Iriarte
Assistant United States Attorney
Chief Criminal Division



Alberto López-Rocafort
Assistant United States Attorney
Deputy Chief, Narcotics Unit



Vanessa E. Bonhomme
Assistant United States Attorney



Kelly Zenón-Matos
Assistant United States Attorney

Exhibit B

AO 442 (Rev. 01/09) Arrest Warrant

UNITED STATES DISTRICT COURT

for the

District of Puerto Rico

United States of America

v.

[57] ALEXIS CALO-VAZQUEZ a/k/a "Calo",

Defendant

Case No. 16-591 (646)

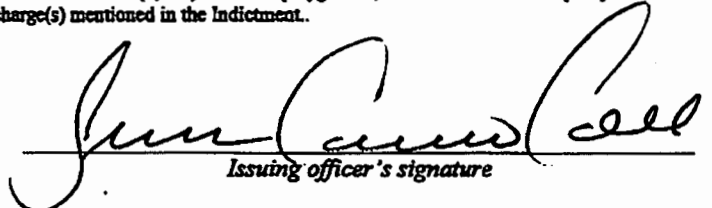
ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay
 (name of person to be arrested) [57] ALEXIS CALO-VAZQUEZ a/k/a "Calo"
 who is accused of an offense or violation based on the following document filed with the court:

- ☐ Indictment ☐ Superseding Indictment ☐ Information ☐ Superseding Information ☐ Complaint
- ☐ Probation Violation Petition ☐ Supervised Release Violation Petition ☐ Violation Notice ☐ Order of the Court

This offense is briefly described as follows: Beginning on a date unknown, but no later than in or about the year 2012, and continuing up to and until the return of the instant Indictment, in the Municipality of San Juan, District of Puerto Rico and within the jurisdiction of this Court, the defendants herein, did knowingly and intentionally, combine, conspire, and agree with each other and with diverse other persons known and unknown to the Grand Jury, to commit an offense against the United States, that is, to knowingly and intentionally possess with intent to distribute and/or to distribute controlled substances, to wit: in excess of two hundred and eighty (280) grams of a mixture or substance containing a detectable amount of cocaine base (crack), a Schedule II Narcotic Drug Controlled Substance; in excess of one (1) kilogram of a mixture or substance containing a detectable amount of heroin, a Schedule I, Narcotic Drug Controlled Substance; in excess of five (5) kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II, Narcotic Drug Controlled Substance; a mixture or substance containing a detectable amount of marijuana, a Schedule I, Controlled Substance; a mixture or substance containing a detectable amount of Oxycodone (commonly known as Percocet), a Schedule II Controlled Substance; and a mixture or substance containing a detectable amount of Alprazolam (commonly known as Xanax), a Schedule IV Controlled Substance; within one thousand (1,000) feet of a real property comprising the Vista Hermosa Public Housing Project, a housing facility owned by a public housing authority, within one thousand (1,000) feet of a real property comprising a public or private elementary, vocational, or secondary school, and within one thousand (1,000) feet of a playground, all within the Municipality of San Juan, Puerto Rico. All in violation of T. 21, USC, §§ 841(a)(1), 846 and 860 and any other charge(s) mentioned in the Indictment.

Date: September 23, 2016City and state: San Juan, Puerto Rico


Issuing officer's signature

Silvia Carreño-Coll, US Magistrate District Judge

Printed name and title

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____
 at (city and state) _____

Date: _____

Arresting officer's signature

Printed name and title